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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**CHAD CARTER,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

RENT-A-CENTER, INC.,

Defendants.

Case No.: 2:15-cv-00178-GMN-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO
DISMISS; MOTION TO STRIKE
CLASS ALLEGATIONS; AND
MOTION TO COMPEL
ARBITRATION**

[FIRST REQUEST]

Plaintiff, CHAD CARTER (“Plaintiff”), and Defendant, RENT-A-CENTER, INC. (“Defendant”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant’s Motion to Dismiss. The current deadline is set for May 18, 2015.

1. Plaintiff’s Complaint was filed on January 30, 2015.
2. Defendant concurrently filed three motions (Motion to Dismiss [Dkt. No. 7], Motion to Compel Arbitration [Dkt. No. 9], Motion to Strike Class Allegations [Dkt. No. 8]) on May 1, 2015.
3. Each Motion is substantially similar to the next.
4. The parties have agreed to an extension of time of 14 days, up to and including June 1, 2015 for Plaintiff to respond to Defendant’s Motions To Dismiss, Compel Arbitration, and Strike Class Allegations.
5. This request is not made for purposes of delay, but rather to allow Plaintiff the opportunity to fully brief each challenge.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including June 1, 2015, for Plaintiff to respond to Defendant’s Motion to Dismiss; Motion to Strike Class Allegations; and Motion to Compel Arbitration.

DATED: May 18, 2015

LITTLER MENDELSON

/s/ Roger L. Grandgenett, II
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IT IS SO ORDERED:

Plaintiff shall have 14 days, up to and including June 1, 2015, to respond to Defendant's Motion to Dismiss; Motion to Strike Class Allegations; and Motion to Compel Arbitration.

Dated this 18th day of May, 2015.

A handwritten signature in black ink, appearing to read 'G. Navarro', is written over a horizontal line.

Gloria M. Navarro, Chief Judge
United States District Court

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: May 15, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen

DANNY HOREN, ESQ.

ATTORNEY FOR PLAINTIFF